

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
GOVERNMENT EMPLOYEES INSURANCE CO.,
GEICO INDEMNITY CO., GEICO GENERAL
INSURANCE COMPANY and GEICO CASUALTY CO.,

Docket No.: 15-CV-7236

Plaintiffs,

-against-

BRUCE JACOBSON, D.C.,
BMJ CHIROPRACTIC, P.C.,
NJ PAIN TREATMENT, P.C.,
JACOBSON CHIROPRACTIC, P.C.,
DR. BRUCE JACOBSON DC P.C.,
NJ NEURO & PAIN, P.C.,
DIANA BEYNIN, D.C.,
PETER ALBIS, D.C.,
GERALDO ZAMBUTO, D.C.,
STEPHEN GIORGIO, D.C.,
ROBERT KLASS, D.C.,
DIPTI PATEL, D.C.,
JONGDUG PARK, D.C.,
HAROLD JAMES, M.D.,
TIMOTHY MORLEY, D.O.,
ANTONIO CORONA, M.D.,
AZUBUOGO AJUDUA, M.D. a/k/a AZU AJUDUA, M.D.,
THOMASINA STRIANO, D.C.,
BHUPINDER SINGH SAWNEY, M.D.,
SHEILA SOMAN, M.D., and
JOHN DOE DEFENDANTS “1” – “10”,

**ANSWER WITH
COUNTERCLAIM**

Trial by Jury Demanded

Defendants.

-----X
Defendant, AZUBUOGO AJUDUA, M.D. a/k/a AZU AJUDUA, M.D. (hereinafter,
“Ajudua” or “Answering Defendant”) by and through his attorneys, RUSSELL FRIEDMAN &
ASSOCIATES, LLP, as and for an answer with counterclaim to Plaintiffs’ Complaint, allege as
follows:

1. Denies the factual allegations contained in paragraph 1 of the Complaint and leave
all questions of law to the Court for its ultimate determination.

2. Denies the factual allegations contained in paragraph 2 of the Complaint and leave all questions of law to the Court for its ultimate determination.

3. Denies the allegations contained in paragraph 3 of the Complaint.

4. Denies the allegations contained in paragraph 4 of the Complaint.

5. Denies the allegations contained in paragraph 5 of the Complaint.

6. Denies the allegations contained in paragraph 6 of the Complaint.

7. Denies the allegations contained in paragraph 7 of the Complaint.

8. Denies the allegations contained in paragraph 8 of the Complaint.

9. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 9 of the Complaint.

10. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 10 of the Complaint.

11. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 11 of the Complaint.

12. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 12 of the Complaint.

13. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 13 of the Complaint.

14. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 14 of the Complaint.

15. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 15 of the Complaint.

16. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 16 of the Complaint.

17. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 17 of the Complaint.

18. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 18 of the Complaint.

19. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 19 of the Complaint.

20. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 20 of the Complaint.

21. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 21 of the Complaint.

22. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 22 of the Complaint.

23. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 23 of the Complaint.

24. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 24 of the Complaint.

25. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 25 of the Complaint.

26. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 26 of the Complaint.

27. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 27 of the Complaint.

28. Denies the allegations contained in paragraph 28 of the Complaint.

29. Denies the allegations contained in paragraph 29 of the Complaint.

30. Denies the allegations contained in paragraph 30 of the Complaint.

31. Denies the allegations contained in paragraph 31 of the Complaint.

32. Denies the allegations contained in paragraph 32 of the Complaint.

33. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 33 of the Complaint.

34. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 34 of the Complaint.

35. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 35 of the Complaint.

36. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 36 of the Complaint.

37. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 37 of the Complaint.

38. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 38 of the Complaint.

39. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 39 of the Complaint.

40. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 40 of the Complaint.

41. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 41 of the Complaint.

42. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 42 of the Complaint.

43. Denies the allegations contained in paragraph 43 of the Complaint.

44. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 44 of the Complaint.

45. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 45 of the Complaint.

46. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 46 of the Complaint.

47. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 47 of the Complaint.

48. Denies the factual allegations contained in paragraph 48 of the Complaint and leave all questions of law to the Court for its ultimate determination.

49. Denies the factual allegations contained in paragraph 49 of the Complaint and leave all questions of law to the Court for its ultimate determination.

50. Denies the factual allegations contained in paragraph 50 of the Complaint and leave all questions of law to the Court for its ultimate determination.

51. Denies the factual allegations contained in paragraph 51 of the Complaint and leave all questions of law to the Court for its ultimate determination.

52. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 52 of the Complaint.

53. Denies the factual allegations contained in paragraph 53 of the Complaint and leave all questions of law to the Court for its ultimate determination.

54. Denies the factual allegations contained in paragraph 54 of the Complaint and leave all questions of law to the Court for its ultimate determination.

55. Denies the factual allegations contained in paragraph 55 of the Complaint and leave all questions of law to the Court for its ultimate determination.

56. Denies the factual allegations contained in paragraph 56 of the Complaint and leave all questions of law to the Court for its ultimate determination.

57. Denies the factual allegations contained in paragraph 57 of the Complaint and leave all questions of law to the Court for its ultimate determination.

58. Denies the factual allegations contained in paragraph 58 of the Complaint and leave all questions of law to the Court for its ultimate determination.

59. Denies the factual allegations contained in paragraph 59 of the Complaint and leave all questions of law to the Court for its ultimate determination.

60. Denies the factual allegations contained in paragraph 60 of the Complaint and leave all questions of law to the Court for its ultimate determination.

61. Denies the factual allegations contained in paragraph 61 of the Complaint and leave all questions of law to the Court for its ultimate determination.

62. Denies the factual allegations contained in paragraph 62 of the Complaint and leave all questions of law to the Court for its ultimate determination.

63. Denies the factual allegations contained in paragraph 63 of the Complaint and leave all questions of law to the Court for its ultimate determination.

64. Denies the factual allegations contained in paragraph 64 of the Complaint and leave all questions of law to the Court for its ultimate determination.

65. Denies the factual allegations contained in paragraph 65 of the Complaint and leave all questions of law to the Court for its ultimate determination.

66. Denies the factual allegations contained in paragraph 66 of the Complaint and leave all questions of law to the Court for its ultimate determination.

67. Denies the factual allegations contained in paragraph 67 of the Complaint and leave all questions of law to the Court for its ultimate determination.

68. Denies the factual allegations contained in paragraph 68 of the Complaint and leave all questions of law to the Court for its ultimate determination.

69. Denies the factual allegations contained in paragraph 69 of the Complaint and leave all questions of law to the Court for its ultimate determination.

70. Denies the factual allegations contained in paragraph 70 of the Complaint and leave all questions of law to the Court for its ultimate determination.

71. Denies the factual allegations contained in paragraph 71 of the Complaint and leave all questions of law to the Court for its ultimate determination.

72. Denies the factual allegations contained in paragraph 72 of the Complaint and leave all questions of law to the Court for its ultimate determination.

73. Denies the factual allegations contained in paragraph 73 of the Complaint and leave all questions of law to the Court for its ultimate determination.

74. Denies the factual allegations contained in paragraph 74 of the Complaint and leave all questions of law to the Court for its ultimate determination.

75. Denies the factual allegations contained in paragraph 75 of the Complaint and leave all questions of law to the Court for its ultimate determination.

76. Denies the factual allegations contained in paragraph 76 of the Complaint and leave all questions of law to the Court for its ultimate determination.

77. Denies the factual allegations contained in paragraph 77 of the Complaint and leave all questions of law to the Court for its ultimate determination.

78. Denies the factual allegations contained in paragraph 78 of the Complaint and leave all questions of law to the Court for its ultimate determination.

79. Denies the factual allegations contained in paragraph 79 of the Complaint and leave all questions of law to the Court for its ultimate determination.

80. Denies the factual allegations contained in paragraph 80 of the Complaint and leave all questions of law to the Court for its ultimate determination.

81. Denies the factual allegations contained in paragraph 81 of the Complaint and leave all questions of law to the Court for its ultimate determination.

82. Denies the factual allegations contained in paragraph 82 of the Complaint and leave all questions of law to the Court for its ultimate determination.

83. Denies the factual allegations contained in paragraph 83 of the Complaint and leave all questions of law to the Court for its ultimate determination.

84. Denies the factual allegations contained in paragraph 84 of the Complaint and leave all questions of law to the Court for its ultimate determination.

85. Denies the factual allegations contained in paragraph 85 of the Complaint and leave all questions of law to the Court for its ultimate determination.

86. Denies the factual allegations contained in paragraph 86 of the Complaint and leave all questions of law to the Court for its ultimate determination.

87. Denies the factual allegations contained in paragraph 87 of the Complaint and leave all questions of law to the Court for its ultimate determination.

88. Denies the factual allegations contained in paragraph 88 of the Complaint and leave all questions of law to the Court for its ultimate determination.

89. Denies the factual allegations contained in paragraph 89 of the Complaint and leave all questions of law to the Court for its ultimate determination.

90. Denies the factual allegations contained in paragraph 90 of the Complaint and leave all questions of law to the Court for its ultimate determination.

91. Denies the factual allegations contained in paragraph 91 of the Complaint and leave all questions of law to the Court for its ultimate determination.

92. Denies the factual allegations contained in paragraph 92 of the Complaint and leave all questions of law to the Court for its ultimate determination.

93. Denies the factual allegations contained in paragraph 93 of the Complaint and leave all questions of law to the Court for its ultimate determination.

94. Denies the factual allegations contained in paragraph 94 of the Complaint and leave all questions of law to the Court for its ultimate determination.

95. Denies the factual allegations contained in paragraph 95 of the Complaint and leave all questions of law to the Court for its ultimate determination.

96. Denies the factual allegations contained in paragraph 96 of the Complaint and leave all questions of law to the Court for its ultimate determination.

97. Denies the allegations contained in paragraph 97 of the Complaint.

98. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 98 of the Complaint.

99. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 99 of the Complaint.

100. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 100 of the Complaint.

101. Denies the allegations contained in paragraph 101 of the Complaint.

102. Denies the allegations contained in paragraph 102 of the Complaint.

103. Denies the allegations contained in paragraph 103 of the Complaint.

104. Denies the allegations contained in paragraph 104 of the Complaint.

105. Denies the allegations contained in paragraph 105 of the Complaint.

106. Denies the allegations contained in paragraph 106 of the Complaint.

107. Denies the allegations contained in paragraph 107 of the Complaint.

108. Denies the allegations contained in paragraph 108 of the Complaint.

109. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 109 of the Complaint.

110. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 110 of the Complaint.

111. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 111 of the Complaint.

112. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 112 of the Complaint.

113. Denies the allegations contained in paragraph 113 of the Complaint.

114. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 114 of the Complaint.

115. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 115 of the Complaint.

116. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 116 of the Complaint.

117. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 117 of the Complaint.

118. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 118 of the Complaint.

119. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 119 of the Complaint.

120. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 120 of the Complaint.

121. Denies the allegations contained in paragraph 121 of the Complaint.

122. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 122 of the Complaint.

123. Denies the allegations contained in paragraph 123 of the Complaint.

124. Denies the allegations contained in paragraph 124 of the Complaint.

125. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 125 of the Complaint.

126. Denies the allegations contained in paragraph 126 of the Complaint.

127. Denies the allegations contained in paragraph 127 of the Complaint.

128. Denies the allegations contained in paragraph 128 of the Complaint.
129. Denies the allegations contained in paragraph 129 of the Complaint.
130. Denies the allegations contained in paragraph 130 of the Complaint.
131. Denies the allegations contained in paragraph 131 of the Complaint.
132. Denies the allegations contained in paragraph 132 of the Complaint.
133. Denies the allegations contained in paragraph 133 of the Complaint.
134. Denies the allegations contained in paragraph 134 of the Complaint.
135. Denies the allegations contained in paragraph 135 of the Complaint.
136. Denies the allegations contained in paragraph 136 of the Complaint.
137. Denies the allegations contained in paragraph 137 of the Complaint.
138. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 138 of the Complaint.
139. Denies the allegations contained in paragraph 139 of the Complaint.
140. Denies the allegations contained in paragraph 140 of the Complaint.
141. Denies the allegations contained in paragraph 141 of the Complaint.
142. Denies the allegations contained in paragraph 142 of the Complaint.
143. Denies the allegations contained in paragraph 143 of the Complaint.
144. Denies the allegations contained in paragraph 144 of the Complaint.
145. Denies the allegations contained in paragraph 145 of the Complaint.
146. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 146 of the Complaint.
147. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 147 of the Complaint.

148. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 148 of the Complaint.

149. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 149 of the Complaint.

150. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 150 of the Complaint.

151. Denies the allegations contained in paragraph 151 of the Complaint.

152. Denies the allegations contained in paragraph 152 of the Complaint.

153. Denies the allegations contained in paragraph 153 of the Complaint.

154. Denies the allegations contained in paragraph 154 of the Complaint.

155. Denies the allegations contained in paragraph 155 of the Complaint.

156. Denies the allegations contained in paragraph 156 of the Complaint.

157. Denies the allegations contained in paragraph 157 of the Complaint.

158. Denies the allegations contained in paragraph 158 of the Complaint.

159. Denies the allegations contained in paragraph 159 of the Complaint.

160. Denies the allegations contained in paragraph 160 of the Complaint.

161. Denies the allegations contained in paragraph 161 of the Complaint.

162. Denies the allegations contained in paragraph 162 of the Complaint.

163. Denies the allegations contained in paragraph 163 of the Complaint.

164. Denies the allegations contained in paragraph 164 of the Complaint.

165. Denies the factual allegations contained in paragraph 165 of the Complaint and leave all questions of law to the Court for its ultimate determination.

166. Denies the factual allegations contained in paragraph 166 of the Complaint and leave all questions of law to the Court for its ultimate determination.

167. Denies the factual allegations contained in paragraph 167 of the Complaint and leave all questions of law to the Court for its ultimate determination.

168. Denies the factual allegations contained in paragraph 168 of the Complaint and leave all questions of law to the Court for its ultimate determination.

169. Denies the allegations contained in paragraph 169 of the Complaint.

170. Denies the allegations contained in paragraph 170 of the Complaint.

171. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 171 of the Complaint.

172. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 172 of the Complaint.

173. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 173 of the Complaint.

174. Denies the allegations contained in paragraph 174 of the Complaint.

175. Denies the allegations contained in paragraph 175 of the Complaint.

176. Denies the allegations contained in paragraph 176 of the Complaint.

177. Denies the factual allegations contained in paragraph 177 of the Complaint and leave all questions of law to the Court for its ultimate determination.

178. Denies the factual allegations contained in paragraph 178 of the Complaint and leave all questions of law to the Court for its ultimate determination.

179. Denies the factual allegations contained in paragraph 179 of the Complaint and leave all questions of law to the Court for its ultimate determination.

180. Denies the allegations contained in paragraph 180 of the Complaint.
181. Denies the allegations contained in paragraph 181 of the Complaint.
182. Denies the factual allegations contained in paragraph 182 of the Complaint and leave all questions of law to the Court for its ultimate determination.
183. Denies the factual allegations contained in paragraph 183 of the Complaint and leave all questions of law to the Court for its ultimate determination.
184. Denies the allegations contained in paragraph 184 of the Complaint.
185. Denies the allegations contained in paragraph 185 of the Complaint.
186. Denies the allegations contained in paragraph 186 of the Complaint.
187. Denies the factual allegations contained in paragraph 187 of the Complaint and leave all questions of law to the Court for its ultimate determination.
188. Denies the factual allegations contained in paragraph 188 of the Complaint and leave all questions of law to the Court for its ultimate determination.
189. Denies the factual allegations contained in paragraph 189 of the Complaint and leave all questions of law to the Court for its ultimate determination.
190. Denies the allegations contained in paragraph 190 of the Complaint.
191. Denies the allegations contained in paragraph 191 of the Complaint.
192. Denies the allegations contained in paragraph 192 of the Complaint.
193. Denies the allegations contained in paragraph 193 of the Complaint.
194. Denies the factual allegations contained in paragraph 194 of the Complaint and leave all questions of law to the Court for its ultimate determination.
195. Denies the allegations contained in paragraph 195 of the Complaint.

196. Denies the factual allegations contained in paragraph 196 of the Complaint and leave all questions of law to the Court for its ultimate determination.

197. Denies the allegations contained in paragraph 197 of the Complaint.

198. Denies the allegations contained in paragraph 198 of the Complaint.

199. Denies the allegations contained in paragraph 199 of the Complaint.

200. Denies the allegations contained in paragraph 200 of the Complaint.

201. Denies the allegations contained in paragraph 201 of the Complaint.

202. Denies the allegations contained in paragraph 202 of the Complaint.

203. Denies the allegations contained in paragraph 203 of the Complaint.

204. Denies the allegations contained in paragraph 204 of the Complaint.

205. Denies the factual allegations contained in paragraph 205 of the Complaint and leave all questions of law to the Court for its ultimate determination.

206. Denies the allegations contained in paragraph 206 of the Complaint.

207. Denies the allegations contained in paragraph 207 of the Complaint.

208. Denies the allegations contained in paragraph 208 of the Complaint.

209. Denies the allegations contained in paragraph 209 of the Complaint.

210. Denies the allegations contained in paragraph 210 of the Complaint.

211. Denies the allegations contained in paragraph 211 of the Complaint.

212. Denies the allegations contained in paragraph 212 of the Complaint.

213. Denies the allegations contained in paragraph 213 of the Complaint.

214. Denies the allegations contained in paragraph 214 of the Complaint.

215. Denies the allegations contained in paragraph 215 of the Complaint.

216. Denies the allegations contained in paragraph 216 of the Complaint.

217. Denies the allegations contained in paragraph 217 of the Complaint.
218. Denies the allegations contained in paragraph 218 of the Complaint.
219. Denies the allegations contained in paragraph 219 of the Complaint.
220. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 220 of the Complaint.
221. Denies the factual allegations contained in paragraph 221 of the Complaint and leave all questions of law to the Court for its ultimate determination.
222. Denies the factual allegations contained in paragraph 222 of the Complaint and leave all questions of law to the Court for its ultimate determination.
223. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 223 of the Complaint.
224. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 224 of the Complaint.
225. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 225 of the Complaint.
226. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 226 of the Complaint.
227. Denies the factual allegations contained in paragraph 227 of the Complaint and leave all questions of law to the Court for its ultimate determination.
228. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 228 of the Complaint.
229. Denies the factual allegations contained in paragraph 229 of the Complaint and leave all questions of law to the Court for its ultimate determination.

230. Denies the allegations contained in paragraph 230 of the Complaint.
231. Denies the allegations contained in paragraph 231 of the Complaint.
232. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 232 of the Complaint.
233. Denies the allegations contained in paragraph 233 of the Complaint.
234. Denies the allegations contained in paragraph 234 of the Complaint except admit that the brain, spinal cord and peripheral nerves are components of the human nervous system.
235. Denies the allegations contained in paragraph 235 of the Complaint except admit that two functions of the nervous system are to collect and relay sensory information through the nerve pathways into the spinal cord and up to the brain, and to transmit signals from the brain into the spinal cord and through the peripheral nerves to initiate muscle activity throughout the body.
236. Admits the allegations contained in paragraph 236 of the Complaint.
237. Admits the allegations contained in paragraph 237 of the Complaint.
238. Admits the allegations contained in paragraph 238 of the Complaint.
239. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 239 of the Complaint.
240. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 240 of the Complaint.
241. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 241 of the Complaint.
242. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 242 of the Complaint.

243. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 243 of the Complaint.

244. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 244 of the Complaint.

245. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 245 of the Complaint.

246. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 246 of the Complaint.

247. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 247 of the Complaint.

248. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 248 of the Complaint.

249. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 249 of the Complaint.

250. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 250 of the Complaint.

251. Denies the allegations in paragraph 251 of the Complaint.

252. Denies the allegations in paragraph 252 of the Complaint.

253. Denies the allegations in paragraph 253 of the Complaint.

254. Denies the allegations in paragraph 254 of the Complaint.

255. Denies the allegations in paragraph 255 of the Complaint.

256. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 256 of the Complaint.

257. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 257 of the Complaint.

258. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 258 of the Complaint.

259. Denies the factual allegations contained in paragraph 259 of the Complaint and leave all questions of law to the Court for its ultimate determination.

260. Denies the allegations contained in paragraph 260 of the Complaint.

261. Denies the allegations contained in paragraph 261 of the Complaint.

262. Denies the allegations contained in paragraph 262 of the Complaint.

263. Denies the allegations contained in paragraph 263 of the Complaint.

264. Denies the factual allegations contained in paragraph 264 of the Complaint and leave all questions of law to the Court for its ultimate determination.

265. Denies the allegations contained in paragraph 265 of the Complaint.

266. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 266 of the Complaint.

267. Denies the allegations contained in paragraph 267 of the Complaint.

268. Denies the allegations contained in paragraph 268 of the Complaint.

269. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 269 of the Complaint.

270. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 270 of the Complaint.

271. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 271 of the Complaint.

272. Denies the allegations contained in paragraph 272 of the Complaint.
273. Denies the allegations contained in paragraph 273 of the Complaint.
274. Denies the allegations contained in paragraph 274 of the Complaint.
275. Denies the allegations contained in paragraph 275 of the Complaint.
276. Denies the allegations contained in paragraph 276 of the Complaint.
277. Denies the allegations contained in paragraph 277 of the Complaint.
278. Denies the allegations contained in paragraph 278 of the Complaint.
279. Denies the allegations contained in paragraph 279 of the Complaint.
280. Denies the factual allegations contained in paragraph 280 of the Complaint and leave all questions of law to the Court for its ultimate determination.
281. Denies the allegations contained in paragraph 281 of the Complaint.
282. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 282 of the Complaint.
283. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 283 of the Complaint.
284. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 284 of the Complaint.
285. Denies the allegations contained in paragraph 285 of the Complaint.
286. Denies the allegations contained in paragraph 286 of the Complaint.
287. Denies the allegations contained in paragraph 287 of the Complaint.
288. Denies the allegations contained in paragraph 288 of the Complaint.
289. Denies the allegations contained in paragraph 289 of the Complaint.
290. Denies the allegations contained in paragraph 290 of the Complaint.

291. Denies the allegations contained in paragraph 291 of the Complaint.
292. Denies the allegations contained in paragraph 292 of the Complaint.
293. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 293 of the Complaint.
294. Denies the allegations contained in paragraph 294 of the Complaint.
295. Denies the allegations contained in paragraph 295 of the Complaint.
296. Denies the allegations contained in paragraph 296 of the Complaint.
297. Denies the allegations contained in paragraph 297 of the Complaint.
298. Denies the allegations contained in paragraph 298 of the Complaint.
299. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 299 of the Complaint.
300. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 300 of the Complaint.
301. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 301 of the Complaint.
302. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 302 of the Complaint.
303. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 303 of the Complaint.
304. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 304 of the Complaint.
305. Denies the allegations contained in paragraph 305 of the Complaint.

306. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 306 of the Complaint.

307. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 307 of the Complaint.

308. Denies the allegations contained in paragraph 308 of the Complaint.

309. Denies the allegations contained in paragraph 309 of the Complaint.

310. Denies the allegations contained in paragraph 310 of the Complaint.

311. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 311 of the Complaint.

312. Denies the allegations contained in paragraph 312 of the Complaint.

313. Denies the allegations contained in paragraph 313 of the Complaint.

314. Denies the allegations contained in paragraph 314 of the Complaint.

315. Denies the allegations contained in paragraph 315 of the Complaint.

316. Denies the allegations contained in paragraph 316 of the Complaint.

317. Denies the allegations contained in paragraph 317 of the Complaint.

318. Denies the allegations contained in paragraph 318 of the Complaint.

319. Denies the allegations contained in paragraph 319 of the Complaint.

320. Denies the allegations contained in paragraph 320 of the Complaint.

321. Denies the allegations contained in paragraph 321 of the Complaint.

322. Denies the factual allegations contained in paragraph 322 of the Complaint and leave all questions of law to the Court for its ultimate determination.

323. Denies the allegations contained in paragraph 323 of the Complaint.

324. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 324 of the Complaint.

325. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 325 of the Complaint.

326. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 326 of the Complaint.

327. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 327 of the Complaint.

328. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 328 of the Complaint.

329. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 329 of the Complaint.

330. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 330 of the Complaint.

331. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 331 of the Complaint.

332. Denies the allegations contained in paragraph 332 of the Complaint.

333. Denies the allegations contained in paragraph 333 of the Complaint.

334. Denies the allegations contained in paragraph 334 of the Complaint.

335. Denies the allegations contained in paragraph 335 of the Complaint.

336. Denies the allegations contained in paragraph 336 of the Complaint.

337. Denies the allegations contained in paragraph 337 of the Complaint.

338. Denies the allegations contained in paragraph 338 of the Complaint.

339. Denies the allegations contained in paragraph 339 of the Complaint.
340. Denies the allegations contained in paragraph 340 of the Complaint.
341. Denies the allegations contained in paragraph 341 of the Complaint.
342. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 342 of the Complaint.
343. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 343 of the Complaint.
344. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 344 of the Complaint.
345. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 345 of the Complaint.
346. Denies the allegations contained in paragraph 346 of the Complaint.
347. Denies the allegations contained in paragraph 347 of the Complaint.
348. Denies the allegations contained in paragraph 348 of the Complaint.
349. Denies the allegations contained in paragraph 349 of the Complaint.
350. Denies the allegations contained in paragraph 350 of the Complaint.
351. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 351 of the Complaint.
352. Denies the allegations contained in paragraph 352 of the Complaint.
353. Denies the allegations contained in paragraph 353 of the Complaint.
354. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 354 of the Complaint.
355. Denies the allegations contained in paragraph 355 of the Complaint.

356. Denies the allegations contained in paragraph 356 of the Complaint.
357. Denies the allegations contained in paragraph 357 of the Complaint.
358. Denies the allegations contained in paragraph 358 of the Complaint.
359. Denies the allegations contained in paragraph 359 of the Complaint.
360. Denies the allegations contained in paragraph 360 of the Complaint.
361. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 361 of the Complaint.
362. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 362 of the Complaint.
363. Denies the allegations contained in paragraph 363 of the Complaint.
364. Denies the allegations contained in paragraph 364 of the Complaint.
365. Denies the allegations contained in paragraph 365 of the Complaint.
366. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 366 of the Complaint.
367. Denies the factual allegations contained in paragraph 367 of the Complaint and leave all questions of law to the Court for its ultimate determination.
368. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 368 of the Complaint.
369. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 369 of the Complaint.
370. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 370 of the Complaint.
371. Denies the allegations contained in paragraph 371 of the Complaint.

372. Denies the allegations contained in paragraph 372 of the Complaint.
373. Denies the factual allegations contained in paragraph 373 of the Complaint and leave all questions of law to the Court for its ultimate determination.
374. Denies the factual allegations contained in paragraph 374 of the Complaint and leave all questions of law to the Court for its ultimate determination.
375. Denies the allegations contained in paragraph 375 of the Complaint.
376. Denies the factual allegations contained in paragraph 376 of the Complaint and leave all questions of law to the Court for its ultimate determination.
377. Denies the factual allegations contained in paragraph 377 of the Complaint and leave all questions of law to the Court for its ultimate determination.
378. Denies the factual allegations contained in paragraph 378 of the Complaint and leave all questions of law to the Court for its ultimate determination.
379. Denies the factual allegations contained in paragraph 379 of the Complaint and leave all questions of law to the Court for its ultimate determination.
380. Denies the factual allegations contained in paragraph 380 of the Complaint and leave all questions of law to the Court for its ultimate determination.
381. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 381 of the Complaint.
382. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 382 of the Complaint.
383. Denies the factual allegations contained in paragraph 383 of the Complaint and leave all questions of law to the Court for its ultimate determination.

384. Denies the factual allegations contained in paragraph 384 of the Complaint and leave all questions of law to the Court for its ultimate determination.

385. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 385 of the Complaint.

386. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 386 of the Complaint.

387. Denies the allegations contained in paragraph 387 of the Complaint.

388. Denies the factual allegations contained in paragraph 388 of the Complaint and leave all questions of law to the Court for its ultimate determination.

389. Denies the factual allegations contained in paragraph 389 of the Complaint and leave all questions of law to the Court for its ultimate determination.

390. Denies the allegations contained in paragraph 390 of the Complaint.

391. Denies the factual allegations contained in paragraph 391 of the Complaint and leave all questions of law to the Court for its ultimate determination.

392. Denies the factual allegations contained in paragraph 392 of the Complaint and leave all questions of law to the Court for its ultimate determination.

393. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 393 of the Complaint.

394. Denies the allegations contained in paragraph 394 of the Complaint.

395. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 395 of the Complaint.

396. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 396 of the Complaint.

397. Denies the factual allegations contained in paragraph 397 of the Complaint and leave all questions of law to the Court for its ultimate determination.

398. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 398 of the Complaint.

399. Denies the factual allegations contained in paragraph 399 of the Complaint and leave all questions of law to the Court for its ultimate determination.

400. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 400 of the Complaint.

401. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 401 of the Complaint.

402. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 402 of the Complaint.

403. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 403 of the Complaint.

404. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 404 of the Complaint.

405. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 405 of the Complaint.

406. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 406 of the Complaint.

407. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 407 of the Complaint.

408. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 408 of the Complaint.

409. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 409 of the Complaint.

410. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 410 of the Complaint.

411. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 411 of the Complaint.

412. Denies the allegations contained in paragraph 412 of the Complaint.

413. Denies the allegations contained in paragraph 413 of the Complaint.

414. Admits the allegations contained in paragraph 414 of the Complaint.

415. Denies the allegations contained in paragraph 415 of the Complaint.

416. Denies the allegations contained in paragraph 416 of the Complaint.

417. Denies the allegations contained in paragraph 417 of the Complaint.

418. Denies the allegations contained in paragraph 418 of the Complaint.

419. Denies the allegations contained in paragraph 419 of the Complaint.

420. Denies the allegations contained in paragraph 420 of the Complaint.

421. Denies the allegations contained in paragraph 421 of the Complaint.

422. Denies the allegations contained in paragraph 422 of the Complaint.

423. Denies the factual allegations contained in paragraph 423 of the Complaint and leave all questions of law to the Court for its ultimate determination.

424. Denies the allegations contained in paragraph 424 of the Complaint.

425. Denies the factual allegations contained in paragraph 425 of the Complaint and leave all questions of law to the Court for its ultimate determination.

426. Denies the allegations contained in paragraph 426 of the Complaint.

AS AND FOR A RESPONSE TO THE FIRST CAUSE OF ACTION

427. As to the allegations contained in paragraph 427 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

428. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 428 of the Complaint.

429. Denies the factual allegations contained in paragraph 429 of the Complaint and leave all questions of law to the Court for its ultimate determination.

430. Denies the factual allegations contained in paragraph 430 of the Complaint and leave all questions of law to the Court for its ultimate determination.

431. Denies the factual allegations contained in paragraph 431 of the Complaint and leave all questions of law to the Court for its ultimate determination.

432. Denies the factual allegations contained in paragraph 432 of the Complaint and leave all questions of law to the Court for its ultimate determination.

433. Denies the factual allegations contained in paragraph 433 of the Complaint and leave all questions of law to the Court for its ultimate determination.

434. Denies the factual allegations contained in paragraph 434 of the Complaint and leave all questions of law to the Court for its ultimate determination.

435. Denies the factual allegations contained in paragraph 435 of the Complaint and leave all questions of law to the Court for its ultimate determination.

436. Denies the factual allegations contained in paragraph 436 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE SECOND CAUSE OF ACTION

437. As to the allegations contained in paragraph 437 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

438. Denies the factual allegations contained in paragraph 438 of the Complaint and leave all questions of law to the Court for its ultimate determination.

439. Denies the factual allegations contained in paragraph 439 of the Complaint and leave all questions of law to the Court for its ultimate determination.

440. Denies the factual allegations contained in paragraph 440 of the Complaint and leave all questions of law to the Court for its ultimate determination.

441. Denies the factual allegations contained in paragraph 441 of the Complaint and leave all questions of law to the Court for its ultimate determination.

442. Denies the factual allegations contained in paragraph 442 of the Complaint and leave all questions of law to the Court for its ultimate determination.

443. Denies the factual allegations contained in paragraph 443 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRD CAUSE OF ACTION

444. As to the allegations contained in paragraph 444 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

445. Denies the factual allegations contained in paragraph 445 of the Complaint and leave all questions of law to the Court for its ultimate determination.

446. Denies the allegations contained in paragraph 446 of the Complaint.

447. Denies the allegations contained in paragraph 447 of the Complaint.

448. Denies the allegations contained in paragraph 448 of the Complaint.

449. Denies the allegations contained in paragraph 449 of the Complaint.

450. Denies the factual allegations contained in paragraph 450 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE FOURTH CAUSE OF ACTION

451. As to the allegations contained in paragraph 451 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

452. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 452 of the Complaint.

453. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 453 of the Complaint.

454. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 454 of the Complaint.

455. Denies the allegations contained in paragraph 455 of the Complaint.

456. Denies the allegations contained in paragraph 456 of the Complaint.

457. Denies the allegations contained in paragraph 457 of the Complaint.

AS AND FOR A RESPONSE TO THE FIFTH CAUSE OF ACTION

458. As to the allegations contained in paragraph 458 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

459. Denies the allegations contained in paragraph 459 of the Complaint.

460. Denies the allegations contained in paragraph 460 of the Complaint.

461. Denies the allegations contained in paragraph 461 of the Complaint.

462. Denies the allegations contained in paragraph 462 of the Complaint.

463. Denies the allegations contained in paragraph 463 of the Complaint.

464. Denies the allegations contained in paragraph 464 of the Complaint.

465. Denies the allegations contained in paragraph 465 of the Complaint.

466. Denies the allegations contained in paragraph 466 of the Complaint.

467. Denies the factual allegations contained in paragraph 467 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE SIXTH CAUSE OF ACTION

468. As to the allegations contained in paragraph 468 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

469. Denies the allegations contained in paragraph 469 of the Complaint.

470. Denies the allegations contained in paragraph 470 of the Complaint.

471. Denies the allegations contained in paragraph 471 of the Complaint.

472. Denies the allegations contained in paragraph 472 of the Complaint.

473. Denies the allegations contained in paragraph 473 of the Complaint.

AS AND FOR A RESPONSE TO THE SEVENTH CAUSE OF ACTION

474. As to the allegations contained in paragraph 474 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

475. Denies the factual allegations contained in paragraph 475 of the Complaint and leave all questions of law to the Court for its ultimate determination.

476. Denies the factual allegations contained in paragraph 476 of the Complaint and leave all questions of law to the Court for its ultimate determination.

477. Denies the factual allegations contained in paragraph 477 of the Complaint and leave all questions of law to the Court for its ultimate determination.

478. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 478 of the Complaint.

479. Denies the allegations contained in paragraph 479 of the Complaint.

480. Denies the factual allegations contained in paragraph 480 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE EIGHTH CAUSE OF ACTION

481. As to the allegations contained in paragraph 481 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

482. Denies the factual allegations contained in paragraph 482 of the Complaint and leave all questions of law to the Court for its ultimate determination.

483. Denies the allegations contained in paragraph 483 of the Complaint.

484. Denies the allegations contained in paragraph 484 of the Complaint.

485. Denies the allegations contained in paragraph 485 of the Complaint.

486. Denies the allegations contained in paragraph 486 of the Complaint.

487. Denies the factual allegations contained in paragraph 487 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE NINTH CAUSE OF ACTION

488. As to the allegations contained in paragraph 488 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

489. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 489 of the Complaint.

490. Denies the factual allegations contained in paragraph 490 of the Complaint and leave all questions of law to the Court for its ultimate determination.

491. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 491 of the Complaint.

492. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 492 of the Complaint.

493. Denies the allegations contained in paragraph 493 of the Complaint.

494. Denies the factual allegations contained in paragraph 494 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TENTH CAUSE OF ACTION

495. As to the allegations contained in paragraph 495 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

496. Denies the allegations contained in paragraph 496 of the Complaint.

497. Denies the allegations contained in paragraph 497 of the Complaint.

498. Denies the allegations contained in paragraph 498 of the Complaint.

499. Denies the allegations contained in paragraph 499 of the Complaint.

500. Denies the allegations contained in paragraph 500 of the Complaint.

501. Denies the allegations contained in paragraph 501 of the Complaint.

502. Denies the allegations contained in paragraph 502 of the Complaint.

503. Denies the allegations contained in paragraph 503 of the Complaint.

504. Denies the factual allegations contained in paragraph 504 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE ELEVENTH CAUSE OF ACTION

505. As to the allegations contained in paragraph 505 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

506. Denies the allegations contained in paragraph 506 of the Complaint.

507. Denies the allegations contained in paragraph 507 of the Complaint.

508. Denies the allegations contained in paragraph 508 of the Complaint.

509. Denies the allegations contained in paragraph 509 of the Complaint.

510. Denies the factual allegations contained in paragraph 510 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWELFTH CAUSE OF ACTION

511. As to the allegations contained in paragraph 511 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

512. Denies the factual allegations contained in paragraph 512 of the Complaint and leave all questions of law to the Court for its ultimate determination.

513. Denies the factual allegations contained in paragraph 513 of the Complaint and leave all questions of law to the Court for its ultimate determination.

514. Denies the factual allegations contained in paragraph 514 of the Complaint and leave all questions of law to the Court for its ultimate determination.

515. Denies the factual allegations contained in paragraph 515 of the Complaint and leave all questions of law to the Court for its ultimate determination.

516. Denies the factual allegations contained in paragraph 516 of the Complaint and leave all questions of law to the Court for its ultimate determination.

517. Denies the factual allegations contained in paragraph 517 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRTEENTH CAUSE OF ACTION

518. As to the allegations contained in paragraph 518 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

519. Denies the factual allegations contained in paragraph 519 of the Complaint and leave all questions of law to the Court for its ultimate determination.

520. Denies the allegations contained in paragraph 520 of the Complaint.

521. Denies the allegations contained in paragraph 521 of the Complaint.

522. Denies the allegations contained in paragraph 522 of the Complaint.

523. Denies the allegations contained in paragraph 523 of the Complaint.

524. Denies the factual allegations contained in paragraph 524 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE FOURTEENTH CAUSE OF ACTION

525. As to the allegations contained in paragraph 525 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

526. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 526 of the Complaint.

527. Denies the factual allegations contained in paragraph 527 of the Complaint and leave all questions of law to the Court for its ultimate determination.

528. Denies the factual allegations contained in paragraph 528 of the Complaint and leave all questions of law to the Court for its ultimate determination.

529. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 529 of the Complaint.

530. Denies the allegations contained in paragraph 530 of the Complaint.

531. Denies the factual allegations contained in paragraph 531 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE FIFTEENTH CAUSE OF ACTION

532. As to the allegations contained in paragraph 532 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

533. Denies the allegations contained in paragraph 533 of the Complaint.

534. Denies the allegations contained in paragraph 534 of the Complaint.

535. Denies the allegations contained in paragraph 535 of the Complaint.

536. Denies the allegations contained in paragraph 536 of the Complaint.

537. Denies the allegations contained in paragraph 537 of the Complaint.

538. Denies the allegations contained in paragraph 538 of the Complaint.

539. Denies the allegations contained in paragraph 539 of the Complaint.

540. Denies the allegations contained in paragraph 540 of the Complaint.

541. Denies the factual allegations contained in paragraph 541 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE SIXTEENTH CAUSE OF ACTION

542. As to the allegations contained in paragraph 542 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

543. Denies the allegations contained in paragraph 540 of the Complaint.

544. Denies the allegations contained in paragraph 540 of the Complaint.

545. Denies the allegations contained in paragraph 540 of the Complaint.

546. Denies the allegations contained in paragraph 540 of the Complaint.

547. Denies the allegations contained in paragraph 540 of the Complaint.

AS AND FOR A RESPONSE TO THE SEVENTEENTH CAUSE OF ACTION

548. As to the allegations contained in paragraph 548 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

549. Denies the factual allegations contained in paragraph 549 of the Complaint and leave all questions of law to the Court for its ultimate determination.

550. Denies the factual allegations contained in paragraph 550 of the Complaint and leave all questions of law to the Court for its ultimate determination.

551. Denies the factual allegations contained in paragraph 551 of the Complaint and leave all questions of law to the Court for its ultimate determination.

552. Denies the factual allegations contained in paragraph 552 of the Complaint and leave all questions of law to the Court for its ultimate determination.

553. Denies the allegations contained in paragraph 553 of the Complaint.

554. Denies the factual allegations contained in paragraph 554 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE EIGHTEENTH CAUSE OF ACTION

555. As to the allegations contained in paragraph 555 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

556. Denies the factual allegations contained in paragraph 556 of the Complaint and leave all questions of law to the Court for its ultimate determination.

557. Denies the allegations contained in paragraph 557 of the Complaint.

558. Denies the allegations contained in paragraph 558 of the Complaint.

559. Denies the allegations contained in paragraph 559 of the Complaint.

560. Denies the allegations contained in paragraph 560 of the Complaint.

561. Denies the factual allegations contained in paragraph 561 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE NINETEENTH CAUSE OF ACTION

562. As to the allegations contained in paragraph 562 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

563. Denies the allegations contained in paragraph 563 of the Complaint.

564. Denies the allegations contained in paragraph 564 of the Complaint.

565. Denies the allegations contained in paragraph 565 of the Complaint.

566. Denies the allegations contained in paragraph 566 of the Complaint.

567. Denies the allegations contained in paragraph 567 of the Complaint.

568. Denies the factual allegations contained in paragraph 568 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTIETH CAUSE OF ACTION

569. As to the allegations contained in paragraph 569 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

570. Denies the allegations contained in paragraph 570 of the Complaint.

571. Denies the allegations contained in paragraph 571 of the Complaint.

572. Denies the allegations contained in paragraph 572 of the Complaint.

573. Denies the allegations contained in paragraph 573 of the Complaint.

574. Denies the allegations contained in paragraph 574 of the Complaint.

575. Denies the allegations contained in paragraph 575 of the Complaint.

576. Denies the allegations contained in paragraph 576 of the Complaint.

577. Denies the allegations contained in paragraph 577 of the Complaint.

578. Denies the factual allegations contained in paragraph 578 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-FIRST CAUSE OF ACTION

579. As to the allegations contained in paragraph 579 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

580. Denies the allegations contained in paragraph 580 of the Complaint.

581. Denies the allegations contained in paragraph 581 of the Complaint.

582. Denies the allegations contained in paragraph 582 of the Complaint.

583. Denies the allegations contained in paragraph 583 of the Complaint.

584. Denies the factual allegations contained in paragraph 584 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-SECOND CAUSE OF ACTION

585. As to the allegations contained in paragraph 585 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

586. Denies the factual allegations contained in paragraph 586 of the Complaint and leave all questions of law to the Court for its ultimate determination.

587. Denies the factual allegations contained in paragraph 587 of the Complaint and leave all questions of law to the Court for its ultimate determination.

588. Denies the factual allegations contained in paragraph 588 of the Complaint and leave all questions of law to the Court for its ultimate determination.

589. Denies the factual allegations contained in paragraph 589 of the Complaint and leave all questions of law to the Court for its ultimate determination.

590. Denies the allegations contained in paragraph 590 of the Complaint.

591. Denies the factual allegations contained in paragraph 591 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-THIRD CAUSE OF ACTION

592. As to the allegations contained in paragraph 592 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

593. Denies the factual allegations contained in paragraph 593 of the Complaint and leave all questions of law to the Court for its ultimate determination.

594. Denies the allegations contained in paragraph 594 of the Complaint.

595. Denies the allegations contained in paragraph 595 of the Complaint.

596. Denies the allegations contained in paragraph 596 of the Complaint.

597. Denies the allegations contained in paragraph 597 of the Complaint.

598. Denies the factual allegations contained in paragraph 598 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-FOURTH CAUSE OF ACTION

599. As to the allegations contained in paragraph 599 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

600. Denies the factual allegations contained in paragraph 600 of the Complaint and leave all questions of law to the Court for its ultimate determination.

601. Denies the factual allegations contained in paragraph 601 of the Complaint and leave all questions of law to the Court for its ultimate determination.

602. Denies the factual allegations contained in paragraph 602 of the Complaint and leave all questions of law to the Court for its ultimate determination.

603. Denies the factual allegations contained in paragraph 603 of the Complaint and leave all questions of law to the Court for its ultimate determination.

604. Denies the allegations contained in paragraph 604 of the Complaint.

605. Denies the factual allegations contained in paragraph 605 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-FIFTH CAUSE OF ACTION

606. As to the allegations contained in paragraph 606 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

607. Denies the allegations contained in paragraph 607 of the Complaint.

608. Denies the allegations contained in paragraph 608 of the Complaint.

609. Denies the allegations contained in paragraph 609 of the Complaint.

610. Denies the allegations contained in paragraph 610 of the Complaint.

611. Denies the allegations contained in paragraph 611 of the Complaint.

612. Denies the allegations contained in paragraph 612 of the Complaint.

613. Denies the allegations contained in paragraph 613 of the Complaint.

614. Denies the allegations contained in paragraph 614 of the Complaint.

615. Denies the factual allegations contained in paragraph 615 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-SIXTH CAUSE OF ACTION

616. As to the allegations contained in paragraph 616 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

617. Denies the allegations contained in paragraph 617 of the Complaint.

618. Denies the allegations contained in paragraph 618 of the Complaint.

619. Denies the allegations contained in paragraph 619 of the Complaint.

620. Denies the allegations contained in paragraph 620 of the Complaint.

621. Denies the factual allegations contained in paragraph 621 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-SEVENTH CAUSE OF ACTION

622. As to the allegations contained in paragraph 622 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

623. Denies the factual allegations contained in paragraph 623 of the Complaint and leave all questions of law to the Court for its ultimate determination.

624. Denies the factual allegations contained in paragraph 624 of the Complaint and leave all questions of law to the Court for its ultimate determination.

625. Denies the factual allegations contained in paragraph 625 of the Complaint and leave all questions of law to the Court for its ultimate determination.

626. Denies the factual allegations contained in paragraph 626 of the Complaint and leave all questions of law to the Court for its ultimate determination.

627. Denies the factual allegations contained in paragraph 627 of the Complaint and leave all questions of law to the Court for its ultimate determination.

628. Denies the factual allegations contained in paragraph 628 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-EIGHTH CAUSE OF ACTION

629. As to the allegations contained in paragraph 629 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

630. Denies the factual allegations contained in paragraph 630 of the Complaint and leave all questions of law to the Court for its ultimate determination.

631. Denies the allegations contained in paragraph 631 of the Complaint.

632. Denies the allegations contained in paragraph 632 of the Complaint.

633. Denies the allegations contained in paragraph 633 of the Complaint.

634. Denies the allegations contained in paragraph 634 of the Complaint.

635. Denies the factual allegations contained in paragraph 635 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE TWENTY-NINTH CAUSE OF ACTION

636. As to the allegations contained in paragraph 636 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

637. Denies the factual allegations contained in paragraph 637 of the Complaint and leave all questions of law to the Court for its ultimate determination.

638. Denies the factual allegations contained in paragraph 638 of the Complaint and leave all questions of law to the Court for its ultimate determination.

639. Denies the factual allegations contained in paragraph 639 of the Complaint and leave all questions of law to the Court for its ultimate determination.

640. Denies the factual allegations contained in paragraph 640 of the Complaint and leave all questions of law to the Court for its ultimate determination.

641. Denies the factual allegations contained in paragraph 641 of the Complaint and leave all questions of law to the Court for its ultimate determination.

642. Denies the factual allegations contained in paragraph 642 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRTIETH CAUSE OF ACTION

643. As to the allegations contained in paragraph 643 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

644. Denies the allegations contained in paragraph 644 of the Complaint.

645. Denies the allegations contained in paragraph 645 of the Complaint.

646. Denies the allegations contained in paragraph 646 of the Complaint.

647. Denies the allegations contained in paragraph 647 of the Complaint.

648. Denies the allegations contained in paragraph 648 of the Complaint.

649. Denies the allegations contained in paragraph 649 of the Complaint.

650. Denies the allegations contained in paragraph 650 of the Complaint.

651. Denies the allegations contained in paragraph 651 of the Complaint.

652. Denies the factual allegations contained in paragraph 652 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRTY-FIRST CAUSE OF ACTION

653. As to the allegations contained in paragraph 653 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

654. Denies the allegations contained in paragraph 654 of the Complaint.

655. Denies the allegations contained in paragraph 655 of the Complaint.

656. Denies the allegations contained in paragraph 656 of the Complaint.

657. Denies the allegations contained in paragraph 657 of the Complaint.

658. Denies the factual allegations contained in paragraph 658 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRTY-SECOND CAUSE OF ACTION

659. As to the allegations contained in paragraph 659 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

660. Denies the factual allegations contained in paragraph 660 of the Complaint and leave all questions of law to the Court for its ultimate determination.

661. Denies the factual allegations contained in paragraph 661 of the Complaint and leave all questions of law to the Court for its ultimate determination.

662. Denies the factual allegations contained in paragraph 662 of the Complaint and leave all questions of law to the Court for its ultimate determination.

663. Denies the factual allegations contained in paragraph 663 of the Complaint and leave all questions of law to the Court for its ultimate determination.

664. Denies the allegations contained in paragraph 664 of the Complaint.

665. Denies the allegations contained in paragraph 665 of the Complaint.

666. Denies the allegations contained in paragraph 666 of the Complaint.

667. Denies the allegations contained in paragraph 667 of the Complaint.

668. Denies the allegations contained in paragraph 638 of the Complaint.

669. Denies the factual allegations contained in paragraph 669 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRTY-THIRD CAUSE OF ACTION

670. As to the allegations contained in paragraph 670 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

671. Denies the allegations contained in paragraph 671 of the Complaint.

672. Denies the allegations contained in paragraph 672 of the Complaint.

673. Denies the allegations contained in paragraph 673 of the Complaint.

674. Denies the allegations contained in paragraph 674 of the Complaint.

675. Denies the factual allegations contained in paragraph 675 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRTY-FOURTH CAUSE OF ACTION

676. As to the allegations contained in paragraph 676 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

677. Denies the allegations contained in paragraph 677 of the Complaint.

678. Denies the factual allegations contained in paragraph 678 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE THIRTY-FIFTH CAUSE OF ACTION

679. As to the allegations contained in paragraph 679 of the Complaint, repeat, reiterate and re-allege each and every admission and denial previously made.

680. Denies the allegations contained in paragraph 680 of the Complaint.

681. Denies the allegations contained in paragraph 681 of the Complaint.

682. Denies the factual allegations contained in paragraph 682 of the Complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A RESPONSE TO THE JURY DEMAND

683. Denies the factual allegations contained in paragraph 683 of the complaint and leave all questions of law to the Court for its ultimate determination.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

684. The Complaint fails to state a cause of action against the Answering Defendant.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

685. The actions taken by the Answering Defendant were made in good faith, without malice and in conformity with any and all applicable laws.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

686. The actions complained of were in full accord with applicable State and Federal law.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

687. All or part of Plaintiffs' claims are barred by the doctrine of unclean hands.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

688. All or part of Plaintiffs' claims are barred by the doctrines of res judicata and/or collateral estoppel.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

689. Any and all reliance by Plaintiffs was unreasonable as a matter of law.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

690. All or part of Plaintiffs' claims are barred by the doctrine of laches.

AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE

691. The Complaint fails to state a cause of action as it fails to properly allege all requisite elements of a RICO conspiracy under 18 USC 1962(c).

AS AND FOR A NINTH AFFIRMATIVE DEFENSE

692. Plaintiff has failed to meet statutory and/or legal conditions precedent to bring some or all the allegations contained in the Complaint.

AS AND FOR A TENTH AFFIRMATIVE DEFENSE

693. The Complaint fails to state a cause of action as it fails to properly allege all requisite elements of a RICO conspiracy under 18 USC 1962(d).

AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE

694. All or part of the Complaint is barred by the statute of limitations.

AS AND FOR A COUNTERCLAIM

695. The Plaintiffs include an insurance carrier which has commenced an action which seeks declarations that it is not required to defend claims accruing under policies which it provided to various insureds.

696. The Plaintiffs include an insurance carrier which has commenced an action which seeks declarations that it is not required to pay first party benefits accruing under policies which it provided to various insureds.

697. The Plaintiffs' actions serve to unduly burden medical providers such as Ajudua by requiring them to participate in a lawsuit which would not have been necessary had the Plaintiffs followed the New York State Insurance Department's Regulations governing the investigation of claims for no-fault benefits.

698. Under New York law, an insured who is cast in a defensive posture by the legal steps an insurer takes in an effort to free itself from its policy obligations and who prevails on the merits, may recover attorneys' fees incurred in defending against the insurer's action.

699. Under New York law, an insurer's duty to defend an insured extends to the defense of any action arising out of the occurrence, including a defense against an insurer's declaratory judgment action.

700. As Plaintiffs have commenced a declaratory judgment action which unnecessarily burdens Ajudua, Plaintiffs will be responsible for Ajudua's attorney's fees, should Ajudua prevail on the merits.

WHEREFORE, Answering Defendant demands judgment dismissing Plaintiffs' Complaint in its entirety and that the Court award such other and further relief including but not limited to an award of the costs and disbursements of this action as well as the attorney's fees sustained in the defense of the within action.

Dated: Lake Success, New York
January 22, 2016

Yours, etc.,
RUSSELL FRIEDMAN & ASSOCIATES, LLP
*Attorneys for Defendant Azubuogo Ajudua, M.D.
a/k/a Azu Ajudua, M.D.*

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